

**AUINBAUH  
SCHEDULE 8**

**THIS INFORMATION IS HIGHLY SENSITIVE CONFIDENTIAL  
AND WILL BE MADE AVAILABLE FOR REVIEW IN  
ACCORDANCE WITH THE TERMS OF THE PROPRIETARY  
AGREEMENT ORDERED IN THIS CAUSE.**



Physical Collocation Checklist				
Collocator:	XYZ		Due Date:	Case Number:
C.O. Location:			Project Manager:	
Status:	IN PROGRESS		Phone:	
Sch. Start	Sch. Comp.	Actual Comp.	Activity	Notes
			CPAT	
			Receive Agreement	
			Receive 1st 50%	
			Receive Preliminary Detailed Equip. Layout	
			Receive Final Detailed Equip. Layout	
			Receive 2nd 50%	
			Provide APOT Information To LSP	
			Access/Security Cards to Proj. Manager	
			NSS	
			Kick-off Meeting	
			Date Of True Up Meeting	
			Floor Space Eng.	
			Floor Plan To Detail & Pwr Eng.	
			Floor Plan To LSP	
			Architect	
			Cage Material Ordered	
			Detailed REM Design Complete	
			Electric, Heat & Air Complete	
			Cage Complete	
			Fiber Conduit Placed	
			Security Complete (i.e. Card Key, Can Lock)	
			Cage Keys Provided To Project Manager	
			Power Eng.	
			Floor Space Drawing Received	
			Material Ordered	
			Adequate CO Ground Bar	
			BDFB Installed	
			Transmission/Detail Eng.	
			Floor Space Drawing Received	
			Material Ordered	
			Detail Spec. Issued	

			SW2123 Issued To CPAT/CPC/Proj. Manager	
			Contractor Start Date	
			POT Frame Installation Complete	
			Cable Rack and Cables Installed	
			Cables Terminated	
			Ready for Occupancy Date	
			CO Gnd Bar Installed	
			Power Cable To BDFB & Pot Frame	
			BDFB And Power Panel Fused	
			DS3 Testing Complete	
			DS1 Testing Complete	
			VG Testing Complete	
			CPC	
			E1 Data Base Loaded	
			Maintenance Engineer	
			Maintenance Review Complete	
			Report Sent to CPAT & Proj. Manager	
			OSPE	
			Inner Duct Placed In Conduit	
			Verify LSP Fiber Is In SWBT Entrance Manhole	
			Pull LSP Fiber to Cage	
			Project Manager	
			Walk Thru With LSP Once Cage Is Erected	
			Mop meeting scheduled	
			Access/Security Cards Tested	
			Cage Turnover Date(necessary access provided)	
			Eff. Billing Date Form Sent To CPAT & ICSC	
			Notify CPAT DS3 Testing Is Complete	
			Notify CPAT DS1 Testing Is Complete	
			Notify CPAT VG Testing Is Complete	
			Required Alarms Tested	
			Maintenance Review Scheduled	
			Final Walk-Thru Scheduled	
			Job Completion Notice Sent To CPAT & ICSC	

**AUINBAUH  
SCHEDULE 10**

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**AUINBAUH  
SCHEDULE 11**

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## **CLEC PROVISION OF A BUSINESS ACCESS LINE USING SWBT FACILITIES**

The following example outlines options for a CLEC to provide local exchange service to one business end-user customer using SWBT facilities. All three scenarios were calculated with the following assumptions:

- The CLEC chooses to use the following SWBT unbundled network elements to replicate SWBT's retail service offering of a flat-rate business access line (1FB): a two-wire analog loop, a two-wire analog switch port and use of SWBT's local switching, common transport, and tandem switching facilities, with a cross-connect between the loop and switch port.
- The CLEC has chosen Method 3 or 4 from the UNE Appendix as its Point of Access to SWBT network elements on an unbundled basis.
- The CLEC's business end-user is in Oklahoma City (Schedule 6 in SWBT's Local Exchange Tariff, Metro Zone 3 on SWBT's STC UNE Price Sheet).
- Originating usage of 1400 minutes per month was used to calculate the monthly recurring local switching rate.
- Calls were assumed to be 50% intra-office, requiring local switching only, and 50% interoffice, requiring local switching and common transport. Tandem switching is involved in 30% of the interoffice calls.
- The CLEC is not collocated in the serving end office.
- White Pages directories are delivered to the end user by SWBT in all scenarios.
- A 19.8% discount has been applied to SWBT's retail price of \$39.81 per month in the Resale scenario.
- The Resale example assumes an existing end user has been converted via electronic processing.



**CLEC PROVISION OF A BUSINESS ACCESS LINE USING SWBT FACILITIES IN  
OKLAHOMA**

Rate Elements	UNE Appendix		NCS Service		Resale	
	NRC	Monthly	NRC	Monthly	NRC	Monthly
2-wire Analog Loop	\$47.45	\$20.70	\$47.45	\$20.70	NA	NA
Analog Line Port	\$80.50	\$3.00	\$80.50	\$3.00	NA	NA
Local Switching	NA	\$8.09	NA	\$8.09	NA	NA
Common Transport	NA	\$0.36	NA	\$0.36	NA	NA
Tandem Switching	NA	\$0.59	NA	\$0.59	NA	NA
Cross Connect						
2-wire Analog Loop to Point of Access	\$93.15	\$1.30	NA	NA	NA	NA
Analog Line Port to Point of Access	\$70.70	\$1.30	NA	NA	NA	NA
Analog Loop to Port	NA	NA	NC	NC	NA	NA
White Pages	\$3.32	NA	\$3.32	NA	NA	NA
Service Order	\$60.00	NA	\$60.00	NA	NA	NA
NCS Charge	NA	NA	\$0.00	\$0.00	NA	NA
Business Access Line	NA	NA	NA	NA	NA	\$31.93
(19.8% discount applied to tariff rate)						
Conversion Charge	NA	NA	NA	NA	\$5.00	NA
TOTAL - First Month	\$355.12	\$35.34	\$191.27	\$32.74	\$5.00	\$31.93
TOTAL - 12 Months	\$355.12	\$424.09	\$191.27	\$392.89	\$5.00	\$383.13



# Local Service Alternatives

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You now have a choice of local telephone service providers. At the time this directory was published, the following companies, in addition to Southwestern Bell, offer local service in the Oklahoma City area and requested that their listings appear in the Southwestern Bell directory.

Detailed information about the availability of local service from companies other than Southwestern Bell may be obtained directly from these companies.



**BROOKS  
FIBER  
COMMUNICATIONS**  
Business Office  
Business Office 405 415-0123  
Trouble Reporting-Data 1-800-828-8760  
Trouble Reporting-Voice 1-800-818-9500



**DIAL TONE  
SAVERS**  
Business Office  
Residence Service 1-888-728-3387  
Business Service 1-800-603-7750  
Repair Service 1-800-281-9647



**LOGIX  
COMMUNICATIONS**  
Business Office  
Customer Service (405) 391-8700  
Repair Service (405) 391-8705  
Sales Department (405) 391-8710



**PS**  
Business Office  
Residence Service 1-800-477-1992  
Business Service 1-800-555-1414  
Repair Service 1-800-909-6939



## INP CONVERSION WITH LOOP

RCMAC



### INP IS NOT LIKE FLIPPING A SWITCH

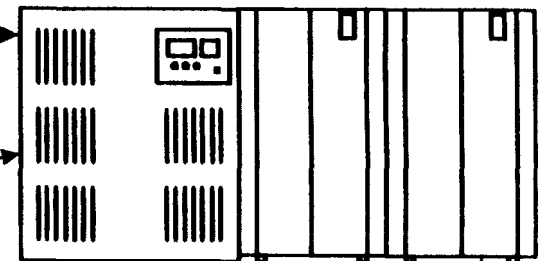
A CLEC passes a Local Service Request (LSR) to the Local Service Center (LSC) indicating they have won an end user and they want to keep their SWBT Telephone Number. The LSC issues orders to disconnect the SWBT dial tone and connect the local loop to a tie pair coming from the CLEC's collocation space. On the due date the CLEC contacts the Local Operations Center (LOC) to work the conversion. A Recent Change Memory Administration Center (RCMAC) specialist disconnects the SWBT dial tone and activates the INP by Remote Call Forwarding (RCF) the old SWBT Telephone Number to the CLEC's Telephone Number. At the same time a SWBT Frame Attendant removes the cross connect between the Local Loop and the SWBT Switch, and places the new cross connect from the Local Loop to the tie pair going to the CLEC's collocation space.



LOCAL  
FRAME

SWBT SWITCHING OFFICE

(918) 794-0574



~~SWBT Switch~~

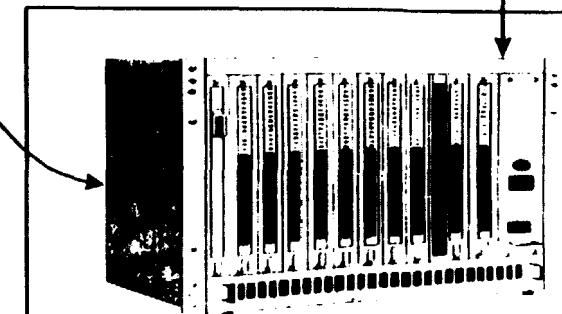
(918) 794-0574  
RCF to  
(918) 329-2941

Old cross connect is  
removed at conversion

Local  
Loop

New cross connect is  
placed at conversion

(918) 329-2941



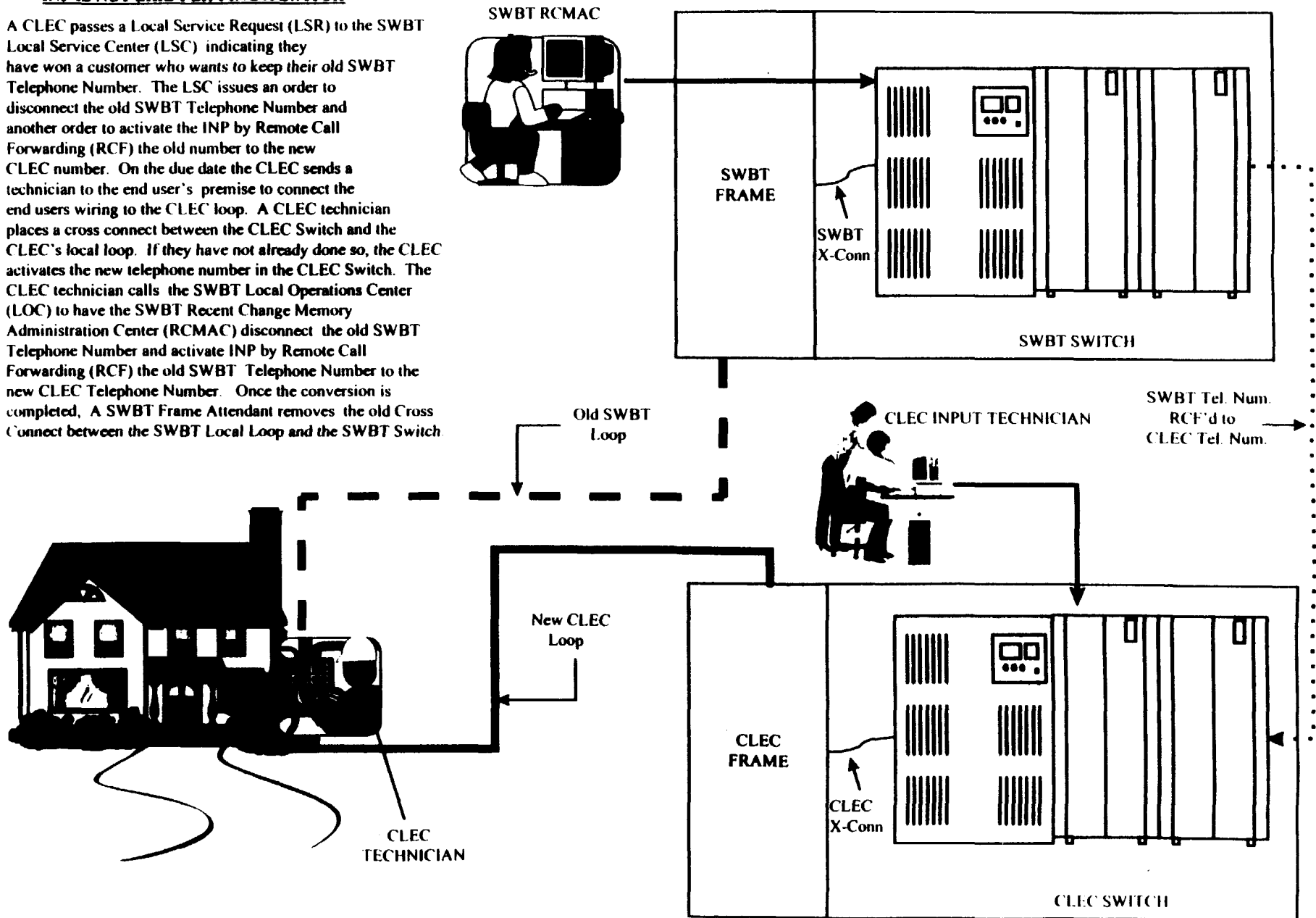
CLEC Equipment in the Collocation Space



## INP CONVERSION WITHOUT LOOP

### INP IS NOT LIKE FLIPPING A SWITCH

A CLEC passes a Local Service Request (LSR) to the SWBT Local Service Center (LSC) indicating they have won a customer who wants to keep their old SWBT Telephone Number. The LSC issues an order to disconnect the old SWBT Telephone Number and another order to activate the INP by Remote Call Forwarding (RCF) the old number to the new CLEC number. On the due date the CLEC sends a technician to the end user's premise to connect the end users wiring to the CLEC loop. A CLEC technician places a cross connect between the CLEC Switch and the CLEC's local loop. If they have not already done so, the CLEC activates the new telephone number in the CLEC Switch. The CLEC technician calls the SWBT Local Operations Center (LOC) to have the SWBT Recent Change Memory Administration Center (RCMAC) disconnect the old SWBT Telephone Number and activate INP by Remote Call Forwarding (RCF) the old SWBT Telephone Number to the new CLEC Telephone Number. Once the conversion is completed, A SWBT Frame Attendant removes the old Cross Connect between the SWBT Local Loop and the SWBT Switch







**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

Application of SBC Communications, Inc.,  
Southwestern Bell Telephone Company, and  
Southwestern Bell Communications Services,  
Inc., d/b/a Southwestern Bell Long Distance,  
for Provision of In-Region, InterLATA  
Services in Oklahoma

STATE OF OKLAHOMA )  
COUNTY OF OKLAHOMA )

SS.

## I. INTRODUCTION

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Competitive Local Exchange Carriers ("CLECs"), advising and participating on matters specific to Oklahoma.

### **II. PROFESSIONAL EXPERIENCE**

2. I graduated in 1966 from Abilene Christian University with a Bachelor of Science degree in Accounting. I began my career with SWBT in 1966 and spent the first 18 years in the Comptrollers/Information Systems Department. In 1984, I moved to the Docket Management position in Oklahoma. In 1987, I assumed the position of District Manager-Industry Relations for Oklahoma. In 1988, I became the Oklahoma Toll Pool administrator. In 1992, I became the District Manager-Rates and Tariffs, and in 1994, I also assumed responsibility for the Industry Relations function. During my career with SWBT, I have attended a variety of training courses, classes, and seminars relating to general management and supervision, along with numerous courses involving general rates and tariffs issues, access services, cost studies, and separations. In June 1990, I attended the management development program at Yale University.

### **III. PURPOSE OF AFFIDAVIT**

3. The purpose of my affidavit is to support the application of SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance, for provision of in-region, interLATA services in Oklahoma. I will discuss the actions the OCC has taken in relation to the introduction of competition in Oklahoma. I will also describe SWBT's methodology for establishing prices for local interconnection, unbundled network elements, reciprocal compensation, resold local services, and other local products and services that are just and reasonable and in accordance with all requirements of the Telecommunications Act of 1996 ("the Act"). These prices are included in SWBT's interconnection agreements and are also reflected in SWBT's Statement of Generally Available Terms and Conditions ("STC") for Oklahoma, which became effective March 17, 1997. SWBT has also proposed prices in the OCC's pending cost and pricing dockets. In addition, I will describe how SWBT has met the resale requirements of the Act.

### **IV. STATUS OF TELECOMMUNICATIONS COMPETITION IN OKLAHOMA**

4. Oklahoma has been in the forefront among the states encouraging

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telecommunications competition. Oklahoma was the first state to adopt rules pertaining to local phone service competition after the passage of the Act. The OCC adopted local phone service competition rules in Cause No. RM 950000019 on March 7, 1996. They went into effect July 1, 1996.

A. In its amended Notice of Proposed Rulemaking, filed on December 27, 1995, the OCC stated:

It is our intention to adopt rules which will signal the nation of Oklahoma's intention to foster and aggressively promote a highly competitive market for local telecommunication services.

B. The OCC also stated in its amended Rule Impact Statement in this proceeding, filed January 11, 1996:

The amended proposed rules will benefit both residential and business customers by allowing the customers to select the telecommunication service provider that offers the service most desired by each individual customer and communities will benefit by a quicker deployment of new technology as it becomes available and thus increase the opportunity for economic development.

5. As of January 31, 1998, forty-eight companies have filed applications for certificates of convenience and necessity ("CCN") to provide local exchange service in Oklahoma. The OCC has granted thirty-one of these applications.

6. The OCC has taken a very aggressive approach to encourage competition in Oklahoma in every telecommunications market. Its efforts in the long distance market began with the issuance of its Order in Cause No. PUD 910001159, a case concerning the provision and regulation of competitive intraLATA telecommunication services in Oklahoma. In Order No. 382799, dated April 22, 1994, the OCC stated:

Removal of those prohibitions by authorized intraLATA toll competition will bring additional benefits to Oklahoma customers in the form of greater customer choice of carriers, lower prices, and greater incentives for all carriers to deploy advanced technology and operate efficiently.

The effect of this decision was to open the intraLATA market to long distance competition. Basically, all intraLATA long distance services were opened to competition with the exception of 1+/0+ calling. AT&T Communications of the Southwest, MCI Telecommunications

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Corporation, and Sprint Communications Company, L.P. stipulated to a conditional four-year moratorium on the issue of equal access presubscription associated with the provision of 1+/0+ intraLATA Message Telecommunication Service ("MTS")

7. In addition to local exchange service and intraLATA toll competition, the OCC has also ordered other markets opened to competition. The Alternative Operator Services ("AOS") market was opened by the OCC to competition in Cause No. RM 940000008, effective July 1, 1995. This rulemaking docket established the requirements for the AOS market. The OCC opened the payphone market to competition by establishing rules in Cause No. RM 960000013, effective May 15, 1997. Competitive Access Providers ("CAPs") are also authorized to operate in Oklahoma. The OCC issued Order No. 394765 on August 21, 1995, in Cause No. PUD 940000486, which certificated Metropolitan Fiber Systems ("MFS") to operate as a CAP in Oklahoma. Brooks Fiber Communications of Oklahoma and Brooks Fiber Communications of Tulsa were also certificated on April 8, 1996, to operate in Oklahoma as CAPs in Cause Nos. PUD 950000139 and 950000140. SWBT was granted a certificate to operate as a CAP in exchanges served by GTE in Oklahoma in Order No. 406118 issued in Cause No. PUD 960000249, on October 16, 1996. More recently, the CCNs approved by the OCC have included the types of services previously provided by a CAP, in addition to local dialtone service.

8. The effectiveness of the OCC's efforts to open telecommunications markets to competition can be seen by the following summary of the number of companies currently operating, in the process of becoming certified to operate, or negotiating interconnection agreements in Oklahoma:

Alternative Operator Services Providers	86
Payphone Providers	50
Competitive Access Providers	11
Competitive Local Exchange Carriers	89

9. SWBT has supported the OCC's efforts to open these markets to competition and to that end has taken an active role in several of the above named proceedings. In Oklahoma, every telecommunications market in which SWBT operates is now open to competition. As can be seen by the above number of competitive entrants, the OCC has done an effective job of setting

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appropriate rules in place to promote competition in Oklahoma.

10. Approval of the 271 Application will benefit Oklahoma consumers not only by allowing SBC Communications, Inc.. to compete in the interLATA long distance market, but also by allowing the interexchange carriers to compete on a dialing parity basis within the intraLATA long distance market. Pursuant to Section 271(e)(2)(A) of the Act, intraLATA toll dialing parity must be provided by a Bell operating company when it exercises its authority to provide interLATA services originating in the State. As indicated earlier, the OCC has stated that Oklahoma consumers benefit by the implementation of more competition within any telecommunications market within the State. Opening both the intraLATA and interLATA long distance markets to full competition would certainly benefit consumers in Oklahoma. Consumers would benefit from more choices of new services, more choices of providers, anticipation of lower prices and more investment in the State. The OCC stated in their comments dated April 30, 1997, in CC Docket No. 97-121, that consumers in Oklahoma would benefit by SWBT's entry into the interLATA long distance market:

Further, it is the opinion of the OCC that the Applicants' entry into the in-region interLATA long distance market is in the public interest for Oklahomans. Citizens of our state will not only benefit from the standpoint of the increased competition in the interLATA long distance that Southwestern Bell's entry will bring, but will also benefit from the standpoint of expediting local exchange competition from providers whose current business plans may favor larger markets than Oklahoma.

11. CLEEK-Schedule I illustrates the status of local competition in Oklahoma as of the date of January 31, 1998. The Attachment shows which CLECs have negotiated an interconnection agreement with SWBT, which agreements have been approved by the OCC, which companies have sought and received a CCN from the OCC to provide local service in Oklahoma, whether each company is providing or will provide service on a resale basis, using some or all of its own facilities, or both, and which companies are currently providing competitive local exchange service in Oklahoma. In addition, the OCC has approved three wireless interconnection agreements, and is in the process of approving three other wireless agreement between SWBT and Oklahoma wireless companies. These agreements have been negotiated pursuant to Section 251(c)(1-2) of the Act. As of January 31, 1998, twenty-seven

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CLECs requests to negotiate interconnection agreements are over six months old. Of these twenty-seven requests, SWBT is actively negotiating with six of the CLECs in an effort to get a final agreement. To the best of SWBT's knowledge, none of the remaining nineteen CLECs are interested in pursuing negotiations with SWBT in Oklahoma at this time. Thirteen of the CLECs have failed to respond to our efforts to set up meetings to address their agreements and eight others have elected to focus on SWBT states other than Oklahoma.

12. On July 29, 1996, AT&T filed an application requesting the OCC to arbitrate unresolved issues regarding an interconnection agreement between AT&T and SWBT. On November 13, 1996, the Arbitrator issued a Report and Recommendations to the OCC. On December 12, 1996, the OCC issued Order No. 407704 in Cause No. PUD 960000218 resolving the disputed issues between the parties. Thereafter, the parties continued negotiations with respect to an interconnection agreement.

13. On April 8, 1997, AT&T filed an Application in Cause No. PUD 970000175 with an attached arbitration agreement and a matrix containing the terms of the agreement which it alleged remained in dispute. AT&T requested the OCC to refer the matter to an arbitrator to resolve all outstanding issues contained within the interconnection agreement and matrix. A procedural schedule was subsequently issued which resulted in an OCC order resolving all outstanding disputes, except for final prices as discussed later, between the parties in both Cause Nos. PUD 960000218 and PUD 970000175.

14. On June 16 and 23, 1997, the Arbitrator submitted his oral recommendations resolving disputed issues related to the interconnection agreement. On June 19, 1997, AT&T and SWBT submitted notice of the issues to be brought before the OCC for appeal. On June 25, 1997, the OCC *en banc* heard oral arguments on appeal and issued a final order on June 30, 1997, in which it adopted and approved the oral recommendations of the Arbitrator and ordered that a finalized interconnection agreement be filed not later than July 14, 1997. On August 18, the OCC issued a final order approving the interconnection agreement.

15. The OCC has also received requests for arbitration under the Act from Sprint, Cox

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and WOLD. All three companies later withdrew their requests for arbitration and have since reached binding negotiated interconnection agreements which have been approved by the OCC.

16. In addition to ensuring that markets in Oklahoma are open to competitors, the OCC has been vigilant in ensuring that new entrants fulfill their own commitments to consumers in Oklahoma. For instance, pursuant to Section 252(c)(3) of the Act, the OCC has formally ordered AT&T to either file a proposed implementation schedule of its interconnection agreement with SWBT in Cause Nos. PUD 960000218 and 970000175 or notify the OCC that it has no present intention to serve the local exchange market in Oklahoma. AT&T has appealed this order to the U.S. District Court for the Western District of Oklahoma and has refused to file an implementation schedule with the OCC. Likewise, in response to inquiries from the OCC Staff regarding commitments it made when seeking a CCN, Brooks Fiber finally began offering residential local exchange service in Oklahoma in October 1997.

17. SWBT's STC for Oklahoma presents a "minimum" set of interconnection provisions, prices and standard terms and conditions that SWBT will make available to any requesting CLEC. SWBT believes the terms of its STC will allow all CLECs to enter the local exchange market quickly. SWBT filed its STC with the OCC on January 15, 1997. The STC was permitted to go into effect on March 17, 1997, and has been continuously available to the CLECs in Oklahoma since that time. The STC reflects SWBT's willingness to provide all interconnection elements, products and services required by the Act, the OCC and currently applicable FCC Rules and Orders.<sup>1</sup> Such terms and conditions do not, however, preclude the normal process of negotiation with SWBT, if desired by a competitor.

18. CLECs enter the Oklahoma markets at their own speed and in accordance with their respective business plans. Due to the workings of Section 271, however, the CLECs' decisions not to enter in all of the Oklahoma local exchange market have resulted in the interLATA long distance market being the only remaining market in Oklahoma which does not enjoy full competition. Oklahoma customers will not have full choice in obtaining their

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<sup>1</sup>The Eight Circuit Court of Appeals issued orders on July 18 and November 14, 1997, in the appeal of the FCC's local interconnection order of August 8, 1996. The Court overturned several sections of the FCC's order.

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telecommunications service until SBC Communications, Inc., is granted freedom to compete in the interLATA market.

### V. PRICES FOR INTERCONNECTION AND NETWORK ELEMENTS

19. SWBT's interconnection agreements with CLECs and its STC guarantee all CLECs access to terms and conditions for local facilities and services, including prices, that satisfy the requirements of the Act. Section 252(a)(1) of the Act, 47 U.S.C. § 252(a)(1), establishes standards for voluntary negotiation of interconnection agreements. That section specifies that upon receiving a request for interconnection, services, or network elements pursuant to Section 251, SWBT must negotiate and may enter into a binding agreement with the requesting telecommunications carrier or carriers on a voluntary basis, without regard to the arbitration requirements set forth in Sections 251(b) and (c), such as the pricing requirements associated with arbitrated agreements. Pursuant to Section 252(a), voluntary agreements which are negotiated are to include a detailed schedule of itemized charges for services and network elements included in the agreements.

20. Section 252(d)(1) establishes pricing standards for interconnection and unbundled network elements, where prices are not set through voluntary negotiations between the parties. This provision specifies that prices for interconnection and unbundled network elements shall be determined by state commissions based on cost ("determined without reference to rate-of-return or other rate-based proceeding"), must be nondiscriminatory, and "may include a reasonable profit." The OCC applies the same standard under state law. *See* OAC 165:55-17-27.

21. Under the Act, the OCC has exclusive jurisdiction over the determination of rates for interconnection and unbundled network elements in Oklahoma. The Eighth Circuit, in its July 18, 1997, decision, confirmed that Congress granted this authority to the states. The Court of Appeals stated, "After carefully reading the language of the Act and fully considering and reviewing all of the arguments, we conclude that the FCC exceeded its jurisdiction in promulgating [federal] pricing rules." Iowa Utils. Board v. FCC, 120 F.3d 753, 794 (8th Cir. 1997). The Eighth Circuit therefore vacated the FCC's rules imposing pricing standards for interconnection and unbundled network elements on the state commissions.



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22. Carrying out its responsibilities under the federal Act, the OCC adopted rules requiring incumbent Local Exchange Carriers (LECs) to provide long-run incremental cost studies and studies identifying common costs for interconnection and unbundled network elements during arbitration proceedings. *See* OAC 165:55-17-25. In addition, the OCC has opened two separate dockets to establish so-called "permanent" rates for unbundled network elements (Cause No. PUD 970000213) and interconnection (Cause No. PUD 970000442) in accordance with these requirements ("the pricing dockets"). In these dockets, the OCC is evaluating SWBT's proposed costs and prices and will set prices in accordance with forward-looking economic cost principles. Hearings in the cost and pricing dockets are scheduled to begin March 9, 1998.

23. The rates established in these dockets will not be "permanent" in a literal sense. Rather, the rates will be subject to periodic review and adjustment in accordance with the Act, Oklahoma law, and OCC policy, just like the "interim" rates already approved by the OCC (described below) and just like the regulated rates for telecommunications services in any jurisdiction.

24. SWBT has filed cost studies supporting its proposed rates for interconnection and unbundled network elements in the OCC pricing dockets. SWBT's prices for interconnection and unbundled network elements have been set at levels equal to forward-looking economic cost plus an appropriate allocation of joint and common costs based upon the costs explained in the accompanying Affidavit of Michael Moore. The only exception is the price for mechanized service order processing of network elements, which, as proposed by AT&T, has been set at the Primary Interexchange Carrier ("PIC") change charge. Cost data is not currently available to perform a Total Element Long-Run Incremental Cost ("TELRIC") study for this service, however, the PIC charge is based upon a function sufficiently similar to the mechanized order to reasonably represent its cost. The rates for mechanized service order processing will remain in effect for the duration of contract until necessary cost data is available.

25. CLEEK-Schedule II to my Affidavit provides a schedule of SWBT's proposed permanent rates for unbundled network elements. The proposed rates were derived using